

1 **BOIES SCHILLER FLEXNER LLP**
2 Mark C. Mao (CA Bar No. 236165)
3 mmao@bsflp.com
4 Beko Reblitz-Richardson (CA Bar No. 238027)
5 brichardson@bsflp.com
6 44 Montgomery Street, 41st Floor
7 San Francisco, CA 94104
8 Tel: (415) 293 6858
9 Fax: (415) 999 9695

10 **SUSMAN GODFREY L.L.P.**
11 Bill Carmody (pro hac vice)
12 bcarmody@susmangodfrey.com
13 Shawn J. Rabin (pro hac vice)
14 srabin@susmangodfrey.com
15 1301 Avenue of the Americas, 32nd Floor
16 New York, NY 10019
17 Telephone: (212) 336-8330

18 **MORGAN & MORGAN**
19 John A. Yanchunis (pro hac vice)
20 jyanchunis@forthepeople.com
21 Ryan J. McGee (pro hac vice)
22 rmcgee@forthepeople.com
23 201 N. Franklin Street, 7th Floor
24 Tampa, FL 33602
25 Telephone: (813) 223-5505

26 *Counsel for Plaintiffs; additional counsel
27 listed in signature blocks below*

1 **QUINN EMANUEL URQUHART &
2 SULLIVAN, LLP**
3 Andrew H. Schapiro (admitted *pro hac vice*)
4 andrewschapiro@quinnmanuel.com
5 191 N. Wacker Drive, Suite 2700
6 Chicago, IL 60606
7 Tel: (312) 705-7400
8 Fax: (312) 705-7401

9 Stephen A. Broome (CA Bar No. 314605)
10 stephenbroome@quinnmanuel.com
11 Viola Trebicka (CA Bar No. 269526)
12 violatrebicka@quinnmanuel.com
13 865 S. Figueroa Street, 10th Floor
14 Los Angeles, CA 90017
15 Tel: (213) 443-3000
16 Fax: (213) 443-3100

17 Diane M. Doolittle (CA Bar No. 142046)
18 dianedoolittle@quinnmanuel.com
19 555 Twin Dolphin Drive, 5th Floor
20 Redwood Shores, CA 94065
21 Telephone: (650) 801-5000
22 Facsimile: (650) 801-5100

23 *Counsel for Defendant; additional counsel
24 listed in signature blocks below*

25 **UNITED STATES DISTRICT COURT
26 NORTHERN DISTRICT OF CALIFORNIA**

27 CHASOM BROWN, MONIQUE
28 TRUJILLO, WILLIAM BYATT, JEREMY
29 DAVIS, and CHRISTOPHER CASTILLO,
30 individually and on behalf of all similarly
31 situated,

32 Plaintiffs,

33 v.

34 GOOGLE LLC,
35 Defendant.

36 Case No. 4:20-cv-03664-YGR-SVK

37 **JOINT STIPULATION AND [PROPOSED]
38 ORDER RE: PLAINTIFFS' MOTION
39 FOR ISSUE CERTIFICATION UNDER
40 RULE 23(C)(4)**

1 Plaintiffs and Defendant Google LLC (collectively, the “Parties”), by and through their
2 respective counsel of record, hereby stipulate and agree as follows:

3 WHEREAS, the Court held a Case Management Conference on February 14, 2023; and

4 WHEREAS, at the Conference, the Court advised that Plaintiffs may file a motion for issue
5 class certification under Rule 23(c)(4); and

6 WHEREAS, the Parties have met and conferred and agreed upon a briefing schedule for that
7 motion, and

8 WHEREAS, the Court and the Parties are in the process of scheduling a hearing date for the
9 Parties’ anticipated motions for summary judgment (“Summary Judgment Hearing”).

10 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the
11 Court’s approval, that:

- 12 1. Plaintiffs shall file any motion for issue certification under Federal Rule 23(c)(4) by
13 March, 14, 2023.
- 14 2. Google shall file any Opposition by April 11, 2023.
- 15 3. Plaintiffs shall file any Reply by April 25, 2023.
- 16 4. The hearing on Plaintiffs’ Rule 23(c)(4) motion shall take place on the same day as
17 the Summary Judgment Hearing, **Friday, May 12, 2023, at 1:00 p.m.**

18 DATED: February 23, 2023
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1 QUINN EMANUEL URQUHART &
 2 SULLIVAN, LLP

3 /s/ Stephen A. Broome

4 Andrew H. Schapiro (admitted *pro hac vice*)
 andrewschapiro@quinnemanuel.com

5 Teuta Fani (admitted *pro hac vice*)
 teutafani@quinnemanuel.com

6 191 N. Wacker Drive, Suite 2700
 Chicago, IL 60606
 Tel: (312) 705-7400
 Fax: (312) 705-7401

7 Stephen A. Broome (CA Bar No. 314605)
 sb@quinnemanuel.com

8 Viola Trebicka (CA Bar No. 269526)
 violatrebicka@quinnemanuel.com

9 Crystal Nix-Hines (Bar No. 326971)
 crystalmixhines@quinnemanuel.com

10 Alyssa G. Olson (CA Bar No. 305705)
 alyolson@quinnemanuel.com

11 865 S. Figueroa Street, 10th Floor
 Los Angeles, CA 90017
 Tel: (213) 443-3000
 Fax: (213) 443-3100

12 Diane M. Doolittle (CA Bar No. 142046)
 dianedoolittle@quinnemanuel.com

13 Sara Jenkins (CA Bar No. 230097)
 sarajenkins@quinnemanuel.com
 555 Twin Dolphin Drive, 5th Floor
 Redwood Shores, CA 94065
 Telephone: (650) 801-5000
 Facsimile: (650) 801-5100

14 Jomaire A. Crawford (admitted *pro hac vice*)
 jomairecrawford@quinnemanuel.com

15 51 Madison Avenue, 22nd Floor
 New York, NY 10010
 Telephone: (212) 849-7000
 Facsimile: (212) 849-7100

16 Josef Ansorge (admitted *pro hac vice*)
 josefansorge@quinnemanuel.com

17 1300 I Street NW, Suite 900
 Carl Spilly (admitted *pro hac vice*)
 carlspilly@quinnemanuel.com
 Xi ("Tracy") Gao (CA Bar No. 326266)
 tracygao@quinnemanuel.com
 Washington D.C., 20005
 Tel: (202) 538-8000
 Fax: (202) 538-8100

18 Jonathan Tse (CA Bar No. 305468)

19 BOIES SCHILLER FLEXNER LLP

20 /s/ Mark Mao

21 Mark C. Mao (CA Bar No. 236165)
 mmao@bsflp.com

22 Beko Reblitz-Richardson (CA Bar No.
 238027)
 brichardson@bsflp.com
 44 Montgomery Street, 41st Floor
 San Francisco, CA 94104
 Tel: (415) 293 6858
 Fax: (415) 999 9695

23 James W. Lee (*pro hac vice*)
 jlee@bsflp.com

24 Rossana Baeza (*pro hac vice*)
 rbaeza@bsflp.com
 100 SE 2nd Street, Suite 2800
 Miami, FL 33130
 Tel: (305) 539-8400
 Fax: (305) 539-1304

25 Bill Carmody (*pro hac vice*)
 bcarmody@susmangodfrey.com

26 Shawn J. Rabin (*pro hac vice*)
 srabin@susmangodfrey.com
 Steven Shepard (*pro hac vice*)
 sshepard@susmangodfrey.com
 Alexander P. Frawley (*pro hac vice*)
 afrawley@susmangodfrey.com

27 SUSMAN GODFREY L.L.P.
 1301 Avenue of the Americas, 32nd Floor
 New York, NY 10019
 Tel: (212) 336-8330

28 Amanda Bonn (CA Bar No. 270891)
 abonn@susmangodfrey.com

SUSMAN GODFREY L.L.P.
 1900 Avenue of the Stars, Suite 1400
 Los Angeles, CA 90067
 Tel: (310) 789-3100

John A. Yanchunis (*pro hac vice*)
 jyanchunis@forthepeople.com

Ryan J. McGee (*pro hac vice*)
 rmcgee@forthepeople.com
 MORGAN & MORGAN, P.A.
 201 N Franklin Street, 7th Floor
 Tampa, FL 33602
 Tel: (813) 223-5505
 Fax: (813) 222-4736

Michael F. Ram (CA Bar No. 104805)
 mram@forthepeople.com

1 jonathantse@quinnmanuel.com
2 50 California Street, 22nd Floor
3 San Francisco, CA 94111
4 Tel: (415) 875-6600
5 Fax: (415) 875-6700

6 *Attorneys for Defendant Google LLC*

7 MORGAN & MORGAN, P.A.
8 711 Van Ness Avenue, Suite 500
9 San Francisco, CA 94102
10 Tel: (415) 358-6913

11 *Attorneys for Plaintiffs*

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ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this Joint Stipulation. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: February 23, 2023

By /s/ *Mark Mao*

Mark Mao

Counsel for Plaintiffs

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: March 2, 2023

Yvonne Gonzalez Rogers
HON. YVONNE GONZALEZ ROGERS
United States District Judge